IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

J.B., a minor child, by and through his next friend, ADDIE WARD, on behalf of himself and all others similarly situated;

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Plaintiff,

* CASE NO:02:06cv755-MHT

*

WALTER WOOD, in his individual capacity,

*

Defendant.

J.B., a minor child, by and through his next friend, ADDIE WARD, on behalf of himself and all others similarly situated;

* * *

Plaintiff,

vs. * CASE NO:02:06cv908-MEF

*

WALTER WOOD, in his individual capacity,

*

Defendant. *

JOINT MOTION FOR EXTENSION OF TIME TO FILE PLAINTIFF'S BRIEF IN RESPONSE TO THE MOTION FOR SUMMARY JUDGMENT

COMES NOW the parties, by and through respective counsel, and hereby request the court extent the time for filing plaintiff's response to the Motion for Summary Judgment and in support thereof state as follows:

- 1. That the Court has directed the plaintiff to file his response to the defendant's motion for summary judgment on or before June 21, 2007.
- 2. That efforts since early May to schedule the deposition of defendant Walter Wood have been hampered by deponent's schedule. Mr. Wood's deposition is currently scheduled for June 27, 2007.
- 3. That an extension to July 9, 2007 is requested for the filing of plaintiff's brief in response to summary judgment.

WHEREFORE THE PREMISES CONSIDERED, the aforementioned relief is requested. Submitted on this the 18th day of June, 2007.

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s//Michael J. Crow Michael J. Crow (CRO039) Attorney for the Plaintiff BEASLEY. ALLEN, CROW, METHVIN, PORTIS & MILES P.O. 4160 Montgomery, AL 36103-4160 334-269-2343

s//T. Dudley Perry, Jr. T. Dudley Perry, Jr. Bar Number:3985-R67T Counsel For the Defendant P.O. Box 66 Mt. Meigs, Alabama 36057 334-215-3803

CERTIFICATE OF SERVICE

I hereby certify that on this 18nd day of June, 2007, the foregoing was electronically filed with the Clerk of this Court thereby providing notice to counsel to all counsel.

s//Robert D. Drummond, Jr.